

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
charlesverhoeven@quinnemanuel.com
3 David A. Perlson (Bar No. 209502)
davidperlson@quinnemanuel.com
4 Melissa Baily (Bar No. 237649)
melissabaily@quinnemanuel.com
John Neukom (Bar No. 275887)
5 johnneukom@quinnemanuel.com
Jordan Jaffe (Bar No. 254886)
jordanjaffe@quinnemanuel.com
6 50 California Street, 22nd Floor
7 San Francisco, California 94111-4788
Telephone: (415) 875-6600
8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

CASE NO. 3:17-cv-00939-WHA

13 Plaintiff,

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS REPLY TO
SPECIAL MASTER COOPER
REGARDING UBER'S OBLIGATION TO
PRODUCE JACOBS LETTER AND
RELATED DOCUMENTS S**

14 vs.

15 UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
16 LLC,

17 Defendants.

18

19

20

21

22

23

24

25

26

27

28

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
 7 Seal (“Waymo’s Administrative Motion”) confidential information in its Reply Submission to Special
 8 Master Cooper Regarding Uber’s Obligation to Produce Jacobs Letter and Related Documents
 9 (“Waymo’s Reply”). Waymo’s Administrative Motion seeks an order sealing the following materials:

| Document | Portions to Be Filed Under Seal | Designating Party |
|-----------------------------|--|--------------------------|
| Waymo’s Reply | Highlighted in blue | Defendants |
| Exhibit 17 to Waymo’s Reply | Entire document | Defendants |
| Exhibit 19 to Waymo’s Reply | Entire document | Defendants |
| Exhibit 20 to Waymo’s Reply | Entire document | Defendants |
| Exhibit 21 to Waymo’s Reply | Entire document | Defendants |
| Exhibit 22 to Waymo’s Reply | Entire document | Defendants |
| Exhibit 23 to Waymo’s Reply | Entire document | Defendants |
| Exhibit 24 to Waymo’s Reply | Entire document | Defendants |

16
 17 3. Waymo’s Reply and exhibits contain information that Defendants have designated as
 18 confidential and/or highly confidential.

19 4. Waymo takes no position on the merits of sealing the designated material, and expects
 20 Defendants to file one or more declarations in accordance with the Local Rules.

21

22

23

24

25

26

27

28

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed in San Francisco, California, on December 21,
3 2017.

4 By /s/ Lindsay Cooper
5 Lindsay Cooper
6 Attorneys for WAYMO LLC

7

8 **SIGNATURE ATTESTATION**

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
10 filing of this document has been obtained from Lindsay Cooper.

11

12 /s/ Charles K. Verhoeven
13 Charles K. Verhoeven

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28